



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-N

SEP 30 2013

Mr. Thomas Bills
Buffalo RMP Team Leader
BLM Buffalo Field Office
1425 Fort Street
Buffalo, WY 82834

Re: Draft Resource Management Plan and Environmental
Impact Statement for the Buffalo Field Office Planning
Area CEQ #20130179

Dear Mr. Bills:

In accordance with our responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the Bureau of Land Management's (BLM) Draft Resource Management Plan and Environmental Impact Statement for the Buffalo Field Office Planning Area (Draft RMP/EIS) as prepared by the Buffalo Field Office (BFO).

We appreciated the opportunity to work with you on air resources issues prior to the public release of the Draft RMP/EIS. This collaboration has allowed us to work through a number of issues and to come to agreement on how to address them. Regarding aquatic resources issues, we appreciate that the BLM has provided EPA with an additional 30 days to submit our comments. Therefore, in this letter, EPA is providing our comments on the Draft RMP/EIS except for topics concerning aquatic resources. EPA will provide a rating of the overall Draft EIS when we submit our comments related to aquatic resources.

Background

This Draft RMP/EIS describes and analyzes alternatives for the planning and management of public lands and resources administered by the BLM BFO. The planning area includes Campbell, Johnson, and Sheridan counties. The BLM will only make decisions on lands that fall under the BLM's jurisdiction. BLM-administered surface totals approximately 782 thousand acres, and the federal mineral estate totals 4.8 million acres. The Draft RMP/EIS estimates approximately 7,700 new coal bed natural gas (CBNG) and 3,600 new conventional oil and gas wells will be installed and indicates there are approximately 26,000 CBNG and 4,100 conventional oil and gas wells existing in the area. For comparison purposes, the 2003 ROD and RMP Amendment for the PRB Project included approximately 51,000 CBNG wells and 3,200 oil wells.

The EPA's Comments and Recommendations

(1) Water Resource Monitoring

The Draft RMP/EIS generally states that water quantity and quality monitoring is performed, but it does not describe the locations, frequency or parameters for monitoring. We recommend that a surface and groundwater monitoring plan be included in the EIS. A comprehensive water resource monitoring program is critical to a successful adaptive management process because it measures the effectiveness of management actions and allows for adjustment of requirements over time if necessary. Recent examples of RMPs requiring groundwater and surface water monitoring include the White River and Grand Junction Draft RMP/ EISs in Colorado. A recent example of a water quality monitoring plan is the "Long-Term Plan for Monitoring of Water Resources" developed by BLM for the Gasco Energy Inc. Uinta Basin Natural Gas Development Project Final EIS¹. Also, the National Ground Water Association's Water Wells in Proximity to Natural Gas or Oil Development Brief² provides information on the importance of baseline sampling for private wells and types of analysis recommended.

The Draft RMP/EIS states that the BFO does not have a program to measure water quality and quantity in relation to the Wyoming Standards for Healthy Rangelands, Standard 5 regarding Clean Water Act standards. Considering there are numerous water bodies in the planning area that are impaired, we recommend that the BLM's surface and groundwater monitoring program consider potential grazing impacts and that the BLM use information gathered from the monitoring program to develop management actions that will reduce adverse impacts to surface and groundwater.

(2) Air Resources

We appreciated the opportunity to work with the BLM on air resource issues prior to the public release of the Draft RMP/EIS. We support the BLM's plan to include emissions information from the Buffalo planning area in current or near-future modeling efforts to analyze potential impacts from Buffalo planning area activities. This approach will allow the BLM, in consultation with an Interagency Review Team, to identify and evaluate the need for additional mitigation measures to protect air quality or the need for a more refined analysis. Our understanding is that the BLM will undertake this modeling effort within approximately two years of issuance of the Buffalo RMP ROD, so that the modeling results can assist BLM in managing the majority of the planned development. We recommend including additional information about BLM's modeling plans in the EIS.

The Draft RMP/EIS includes a baseline air emission inventory for 2005. Because there has been additional oil and gas development in the BFO since 2005, we recommend that the EIS include an emissions inventory for 2013 or 2014 to better represent existing conditions and provide a more accurate baseline for comparing potential future impacts. In addition, the Draft RMP/EIS includes two future year inventories (2015 and 2024). To ensure that the full impact of future management actions is disclosed and considered, we recommend that the EIS include the following: 1) a future year emissions inventory

¹

http://www.blm.gov/pgdata/etc/medialib/blm/ut/vernal_fo/planning/gasco_eis/gasco_folder_6.Par.10452.File.dat/28_Gasco%20Appendix%20O.%20Long-term%20Water%20Monitoring%20Plan.pdf

² http://region8water.colostate.edu/PDFs/Water_Wells_in_proximityNGWA2011.pdf

that represents the greatest amount of air emissions expected, and 2) a comparison between emissions from the more recent base year above and the year with the greatest emissions.

Conclusion

Thank you for the opportunity to comment on this document. We look forward to working with you on our remaining concerns. If you have any questions about our comments, please contact me at 303-312-6925, or you may contact Vanessa Hinkle of my staff at 303-312-6551.

Sincerely,

A handwritten signature in black ink, appearing to read 'Suzanne J. Bohan', with a long horizontal flourish extending to the right.

Suzanne J. Bohan

Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

